

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS **FILED**
IN CLERK'S OFFICE
CENTRAL DIVISION

GERALD F. RICHARDS,

2004 APR 22 P 1:11
CIVIL ACTION NO. 04-40054 NMG

Plaintiff,

U.S. DISTRICT COURT
DISTRICT OF MASS.

v.

SOUTHBRIDGE POWER & THERMAL,
LLC.

Defendant.

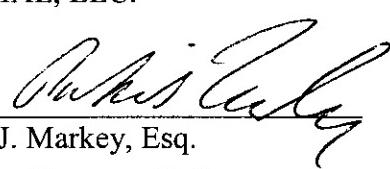
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DEFENDANT'S MOTION FOR ADMISSION OF COUNSEL
PRO HAC VICE

The Defendant, Southbridge Power & Thermal, LLC, hereby moves by undersigned counsel, Patrick J. Markey, pursuant to Local Rule 83.5.3(d) for the admission *pro hac vice* of Douglas B. Sanders, Esq. to appear and practice in this Court as co-counsel for the Defendant in this proceeding. In support of this Motion, please see the attached Affidavit of Douglas B. Sanders.

Respectfully submitted,

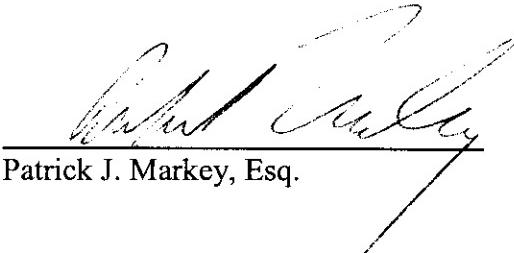
SOUTHBRIDGE POWER AND
THERMAL, LLC.

By: 
Patrick J. Markey, Esq.
Robinson Donovan, P.C.
1500 Main Street – Suite 1600
Springfield, MA 01115
413-732-2301
BBO No.: 568124

CERTIFICATE OF SERVICE

I, Patrick J. Markey, Esq., hereby certify that on this 21st day of April, 2004, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Charlotte E. Glinka, Keches & Mallen, P.C., 122 Dean Street, Taunton, MA 02780.

Subscribed under the penalties of perjury.



Patrick J. Markey, Esq.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GERALD F. RICHARDS,) CIVIL ACTION NO. 04-40054 NMG
)
Plaintiff,)
v.)
)
SOUTHBRIDGE POWER &)
THERMAL, LLC.)
)
Defendant.)

AFFIDAVIT OF DOUGLAS B. SANDERS

I, Douglas B. Sanders, hereby depose and say:

1. I am over the age of eighteen (18) years and understand the obligations of an oath.
2. I am a member of the law firm of Baker & McKenzie.
3. My office address is 130 E. Randolph Drive, Chicago, Illinois 60601
4. Service of all papers may be made upon Patrick Markey, Robinson Donovan Madden & Barry, Tower Square, Suite 1600, 1500 Main Street, Springfield, MA 01115, a member of the bar of this Court having an office within the District of Massachusetts.
5. I am admitted to practice before the following courts: State of Illinois (1998), Northern District of Illinois (1998) and Court of Appeals for the Seventh Circuit (2001).

6. I have never been denied admission to or disciplined by this Court or a court in any other jurisdiction.

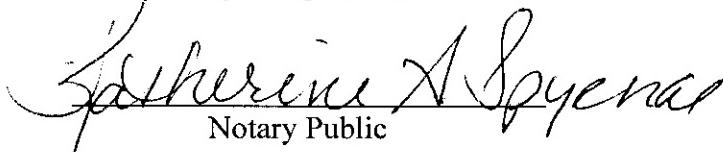
7. I am in good standing in all jurisdictions where I have been admitted to practice.

8. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.



Douglas B. Sanders

Subscribed and sworn to before me
this 19th day of April, 2004



KATHERINE A. SPYRNAL
Notary Public

My commission expires: 4/26/07

